

# **Exhibit E**

**Lamkin, Rachael**

---

**From:** Joseph J. Zito <jzito@whitestone.law>  
**Sent:** Friday, November 3, 2023 12:28 PM  
**To:** Lamkin, Rachael  
**Cc:** ksheets@aipisolutions.com; William Ramey; Erik Lund; Litigation Attorneys; LitigationParalegals; Edlin, Elise (SFO); Dreyer, Lauren; Gonzales, Natalie; Piepmeier, Sarah (SFO); House, Ariel  
**Subject:** Re: Compliance with the Court's PI

[EXTERNAL EMAIL]

Yes, that is correct, for Prior Defendants who owe no future payments to Valjakka.

Joseph J. Zito  
WHITESTONE LAW  
Suite 550  
1850 Towers Crescent Plaza  
Tysons, Virginia 22182  
[jzito@whitestone.law](mailto:jzito@whitestone.law)  
202-466-3500

On 11/3/2023 11:01 AM, Lamkin, Rachael wrote:

Joe,

Thank you for your reply. To be clear, are you saying that the PI Order does not need to be sent to the defendants who have settled with Valjakka under your interpretation of the Court's Order?

Rachael  
Rachael D. Lamkin  
916.747.6091

On Nov 3, 2023, at 9:52 AM, Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)> wrote:

[EXTERNAL EMAIL]

Rachael:

I received a copy of the Sealed PI Order DE#204 yesterday. I understand that the date for redaction was November 25 (i.e. one week from October 18, as per DE#205) Thus the date for "transmission" is November 6.

To be clear, in addition to CDN and IPRA, who have already received copies, the document needs to be sent to any licensee that owes money to Valjakka, to ensure that the money is not transferred out to a third party and to ensure that no money or other assets is "sold, used, moved, concealed, transferred or otherwise disposed of" by Valjakka when it becomes "in his possession, custody or control."

We will make appropriate transmissions on Monday.

You also have my assurances that any future "Enforcement Assets" will be received directly into a Whitestone IOLTA account and held until such time as the PI is lifted and only be disbursed pursuant to a Court ruling. We will provide you with any accounting related to the IOLTA.

Joseph J. Zito  
WHITESTONE LAW  
Suite 550  
1850 Towers Crescent Plaza  
Tysons, Virginia 22182  
[jzito@whitestone.law](mailto:jzito@whitestone.law)  
202-466-3500

On 11/3/2023 7:33 AM, Lamkin, Rachael wrote:

Bill, Joe, Ken,

Please provide by noon PST today proof you complied with the Court's Order to serve a copy of his Order on all licensees. In your continued silence, we will assume non-compliance.

Rachael

---

**From:** Lamkin, Rachael  
**Sent:** Thursday, November 2, 2023 11:36 AM  
**To:** [ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com); Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)>; William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; Erik Lund <[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>; LitigationParalegals <[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise (SFO) <[EEedlin@perkinscoie.com](mailto:EEedlin@perkinscoie.com)>; Dreyer, Lauren <[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales, Natalie Alfaro <[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>; Piepmeier, Sarah (SFO) <[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>; House, Ariel <[ariel.house@bakerbotts.com](mailto:ariel.house@bakerbotts.com)>  
**Subject:** RE: Compliance with the Court's PI

Ken, Bill, Joe,

As you know, the Court ordered Mr. Valjakka to provide a copy of the Court's PI Order to all licensees within ten days of that order, i.e., by 10/28/23. Dkt. No. 202, at 13. Please demonstrate your compliance with said Order.

Rachael

---

**From:** Lamkin, Rachael  
**Sent:** Monday, October 30, 2023 2:22 PM  
**To:** [ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com); Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)>; William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; Erik Lund <[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;

LitigationParalegals <[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise (SFO)  
<[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales, Natalie Alfaro  
<[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>; Piepmeier, Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>  
**Subject:** RE: Compliance with the Court's PI

Ken, Bill, Joe,

Please respond to my request, sent one week ago. Absent a response, we will assume there is no confidential information in Mr. Valjakka's CUVTA discovery responses. To the extent you disagree, please identify the exact information you believe is confidential and the legal basis for that belief.

Rachael

---

**From:** Lamkin, Rachael  
**Sent:** Tuesday, October 24, 2023 5:34 AM  
**To:** [ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com); Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)>; William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; Erik Lund <[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>; LitigationParalegals <[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise (SFO) <[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer, Lauren <[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales, Natalie Alfaro <[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>; Piepmeier, Sarah (SFO) <[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>  
**Subject:** Re: Compliance with the Court's PI

Ken, Bill, Joe,

Good morning. Please identify the information in this response you think is confidential and the reason for said confidentiality. I don't believe any of the information therein was or remains confidential.

Rachael  
Rachael D. Lamkin  
916.747.6091

On Oct 19, 2023, at 2:37 PM, Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)> wrote:

Ken,

Thanks for sending. We'll accept it.

Rachael

---

**From:** [Ksheets@aipisolutions.com](mailto:Ksheets@aipisolutions.com)  
<[ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com)>  
**Sent:** Thursday, October 19, 2023 1:38 PM  
**To:** Lamkin, Rachael <[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>;  
Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)>; William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; 'Erik Lund'  
<[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;  
LitigationParalegals <[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>;  
Edlin, Elise (SFO) <[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer,  
Lauren <[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales,  
Natalie Alfaro <[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>;  
Piepmeier, Sarah (SFO) <[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>  
**Subject:** RE: Compliance with the Court's PI

[EXTERNAL EMAIL]

Rachel,

I attached an updated certified discovery response from Mr. Valjakka with the statement "I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct." Does this suffice?

Regards,  
Ken

---

**From:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>  
**Sent:** Friday, October 13, 2023 7:26 PM  
**To:** Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)>; William  
Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; 'Erik Lund'  
<[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;  
LitigationParalegals <[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>;  
[Ksheets@aipisolutions.com](mailto:Ksheets@aipisolutions.com); Edlin, Elise (SFO)  
<[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales, Natalie  
Alfaro <[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>; Piepmeier,  
Sarah (SFO) <[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>  
**Subject:** RE: Compliance with the Court's PI

Joe,

The interrogatories are not actually verified. All verifications must state the date and location of their signing and state that they are being signed under penalty of perjury. And, because Mr. Valjakka is in Finland, his verification must state, "I

certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct”.

See Cal Civ Proc 2015.5

[Cal. Civ. Proc. Code § 2015.5 \(Deering, Lexis Advance through the 2023 Extra Session Ch 1, 2023 Regular Session Ch. 261\)](#)

See also

[Mabvax Therapeutics Holdings v. Honing E-File, 2021 Cal. Super. LEXIS 53672, \\*2](#)

[Stone Brewing Co., LLC v. Molson Coors Brewing Co., No. 18cv331-BEN-LL, 2019 U.S. Dist. LEXIS 58616, at \\*15 \(S.D. Cal. Apr. 4, 2019\)](#)

Please send a proper verification.

Rachael

---

**From:** Joseph J. Zito <[jzito@whitestone.law](mailto:jzito@whitestone.law)>  
**Sent:** Friday, October 13, 2023 3:38 PM  
**To:** Lamkin, Rachael <[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>; William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; 'Erik Lund' <[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>; LitigationParalegals <[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise (SFO) <[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer, Lauren <[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales, Natalie Alfaro <[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>; Piepmeier, Sarah (SFO) <[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>  
**Subject:** Re: Compliance with the Court's PI

[EXTERNAL EMAIL]

Onni is available Next week. We will provide specific dates on Monday.

Joseph J. Zito  
WHITESTONE LAW  
[jzito@whitestone.law](mailto:jzito@whitestone.law)  
202-466-3500

On 10/13/2023 6:26 PM, Lamkin, Rachael wrote:

Thanks Joe,

Nothing was attached. Can you resend?

Also please proposed dates for Onni's deposition.

Finally, when will you and Ken be making appearances?

Rachael

---

**From:** Joseph J. Zito  
<[jzito@whitestone.law](mailto:jzito@whitestone.law)>  
**Sent:** Friday, October 13, 2023 3:22 PM  
**To:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>;  
William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; 'Erik Lund'  
<[elund@whitestone.law](mailto:elund@whitestone.law)>  
**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;  
LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin,  
Elise (SFO) <[EEEdlin@perkinscoie.com](mailto:EEEdlin@perkinscoie.com)>;  
Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>;  
Gonzales, Natalie Alfaro  
<[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>;  
Piepmeier, Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>  
**Subject:** Re: Compliance with the  
Court's PI

[EXTERNAL EMAIL]

Rachael:

Lauri was mistaken, CDN was not dissolved, see amended / verified Discovery responses.

Joseph J. Zito  
WHITESTONE LAW  
[jzito@whitestone.law](mailto:jzito@whitestone.law)  
202-466-3500

On 10/13/2023 6:11 PM, Lamkin,  
Rachael wrote:

Thanks Ken,

Still missing is the  
dissolution paperwork  
for CDN Licensing. Can

you also send that  
paperwork please?

Rachael

---

**From:**

[Ksheets@aipisolutions.com](mailto:Ksheets@aipisolutions.com)  
<[ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com)>

**Sent:** Friday, October  
13, 2023 3:01 PM

**To:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>; William

Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; Joseph J Zito  
<[jzito@whitestone.law](mailto:jzito@whitestone.law)>;

[emorehouse@whitestone.law](mailto:emorehouse@whitestone.law); 'Erik Lund'  
<[elund@whitestone.law](mailto:elund@whitestone.law)>

**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;

LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise  
(SFO)

<[EEEdlin@perkinscoie.com](mailto:EEEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales,  
Natalie Alfaro  
<[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>;

Piepmeier, Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>

**Subject:** RE:  
Compliance with the  
Court's PI

[EXTERNAL EMAIL]

Rachael,

I have attached  
documents in response



to your request. Three documents relate to formation of CDN Licensing. Two documents are a) ordering the PI transcript and b) sending the transcript to Mr. Valjakka.

Regards,  
Ken

---

**From:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>

**Sent:** Friday, October 13, 2023 1:31 PM

**To:** William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>;  
[emorehouse@aipisolutions.com](mailto:emorehouse@aipisolutions.com);  
[elund@aipisolutions.com](mailto:elund@aipisolutions.com); Joseph J Zito  
<[jzito@whitestone.law](mailto:jzito@whitestone.law)>;  
[Ksheets@aipisolutions.com](mailto:Ksheets@aipisolutions.com)

**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;  
LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise  
(SFO)  
<[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Gonzales,  
Natalie Alfaro  
<[natalie.gonzales@bakerbotts.com](mailto:natalie.gonzales@bakerbotts.com)>;  
Piepmeier, Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>

**Subject:** Compliance  
with the Court's PI

Joe, Bill, Ken,

Please provide these items today:

1. The email Mr. Valjakka testified to in his deposition yesterday: the email wherein Bill Ramey sent Mr. Valjakka a link to the transcript of the Court's PI hearing;
2. the exact date that Mr. Ramey called Mr. Valjakka to explain the Court's PI Order; and
3. proof that Bill Ramey or anyone on this team has purchased or has otherwise accessed the transcript of the Court's PI hearing, with proof of the date of said purchase or access.

We are deciding today whether we need to move the Court for a remedy based on the failure to advise Mr. Valjakka as to the scope of the Court's PI Order.

Thank you for your prompt attention to this critical issue.

Rachael

---

**From:** William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>

**Sent:** Tuesday, October 3, 2023 2:12 AM

**To:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>; AiPi,  
Solutions LLC (Work)  
<[emorehouse@aipisolutions.com](mailto:emorehouse@aipisolutions.com)>; AiPi,  
Solutions LLC (Work)  
<[elund@aipisolutions.com](mailto:elund@aipisolutions.com)>; Joseph J Zito  
<[jzito@whitestone.law](mailto:jzito@whitestone.law)>; ken sheets (Work)  
<[ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com)>

**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;  
LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise  
(SFO)  
<[EEdlin@perkinscoie.com](mailto:EEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Piepmeier,  
Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>

**Subject:** RE: CUVTA  
Discovery

**Importance:** High

[EXTERNAL EMAIL]

Hi Rachael,

We are extremely busy on the MSJ responses but do not want seem unresponsive. I have copied my co-counsel who has worked on this matter with us from the start. They can help you with this.

Copied here are Eric Morehouse, Joe Zito, Erik Lund and Ken Sheets. We have been informed that at least Joe will be making an appearance.

Thanks,

Bill

William P. Ramey, III

<image001.png>  
5020 Montrose Bvd.,  
Suite 800  
Houston, Texas 77006  
(713) 426-3923  
(832) 900-4941  
(facsimile)

This communication is CONFIDENTIAL and may be privileged. If you are not the intended recipient, please notify me immediately and delete this message. Further disclosure or copying of any portion of this message is unauthorized.

---

**From:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>  
**Sent:** Monday, October 2, 2023 3:42 PM  
**To:** William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>  
**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;  
LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise  
(SFO)

<[EEEdlin@perkinscoie.com](mailto:EEEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Piepmeier,  
Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>

**Subject:** RE: CUVTA  
Discovery

Hi Bill,

Following up on  
below. Let me know if  
you think a phone call  
would be easier. We  
need to discuss dates of  
production and email  
production, dates of  
privilege log  
production, and depo  
dates after same.

Rachael

---

**From:** William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>

**Sent:** Thursday,  
September 28, 2023  
12:36 PM

**To:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>

**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;

LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise  
(SFO)

<[EEEdlin@perkinscoie.com](mailto:EEEdlin@perkinscoie.com)>; Dreyer, Lauren  
<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Piepmeier,  
Sarah (SFO)  
<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>

**Subject:** RE: CUVTA  
Discovery

[EXTERNAL EMAIL]

Hi Rachael,

Let me talk with the client. It will likely be Monday before I can get back to you.

Bill

---

**From:** Lamkin, Rachael  
<[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>

**Sent:** Thursday,  
September 28, 2023  
2:14 PM

**To:** William Ramey  
<[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>

**Cc:** Litigation Attorneys  
<[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>;

LitigationParalegals  
<[LitParalegals@rameyfirm.com](mailto:LitParalegals@rameyfirm.com)>; Edlin, Elise  
(SFO)

<[EEEdlin@perkinscoie.com](mailto:EEEdlin@perkinscoie.com)>; Dreyer, Lauren

<[Lauren.Dreyer@BakerBotts.com](mailto:Lauren.Dreyer@BakerBotts.com)>; Piepmeier,  
Sarah (SFO)

<[SPiepmeier@perkinscoie.com](mailto:SPiepmeier@perkinscoie.com)>

**Subject:** CUVTA  
Discovery

Hi Bill,

In light of the Court Order adopting our requested CUVTA discovery and ordering depositions in October, I want to make sure Netflix will get a full document production, including emails, before depositions. If you do not think a full production can be done in time for October

depositions, we need to discuss a stipulated modification to the Court's Order.

Regarding emails, the model order calls for 5 custodians and terms. We have only sought one RFP so let us know if you still want specific custodians and terms identified. We can get those to you today if that is your preference.

Rachael

**Rachael D. Lamkin**

Partner

**Baker Botts L.L.P.**

[Rachael.Lamkin@BakerBotts.com](mailto:Rachael.Lamkin@BakerBotts.com)

T +1.415.291.6264

M +1.916.747.6091

<image002.jpg>

<image002.jpg>

<image002.jpg>

<image002.jpg>

<image002.jpg>

<image002.jpg>

**Confidentiality  
Notice:**

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or

use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.